

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

CITY OF DETROIT, MICHIGAN

Chapter 9
Case No. 13-53846-swr
Hon. Steven W. Rhodes

**OBJECTION OF THE RETIRED DETROIT POLICE MEMBERS ASSOCIATION TO
MOTION OF DEBTOR FOR ENTRY OF AN ORDER (I) AUTHORIZING THE
ASSUMPTION OF THAT CERTAIN FORBEARANCE AND OPTIONAL
TERMINATION AGREEMENT PURSUANT TO SECTION 365(a) OF THE
BANKRUPTCY CODE, (II) APPROVING SUCH AGREEMENT PURSUANT
TO RULE 9019, AND (III) GRANTING RELATED RELIEF AND CONCURRENCE IN
OBJECTION FILED BY ERSTE EUROPAISCHE PFANDBRIEF-UND
KOMMUNALKREDITBANK AKTIENGESELLSCHAFT**

The Retired Detroit Police Members Association (“RDPMA”), by and through its attorneys, Strobl & Sharp, P.C., without acknowledging the jurisdiction of this Court, the constitutionality of the City of Detroit’s (“Debtor” or “Detroit”) Chapter 9 bankruptcy filing, or the eligibility of Detroit to relief under Chapter 9 of the Bankruptcy Code, hereby submits its objection to the Motion of Debtor for Entry of an Order (I) Authorizing the Assumption of that Certain Forbearance and Optional Termination Agreement Pursuant to Section 365(a) of the Bankruptcy Code, (II) Approving Such Agreement Pursuant to Rule 9019, and (III) Granting Related Relief (the “Motion”), and states as follows,

1. The Motion, as filed by the Debtor, fails to provide parties with sufficient information that would allow any party of interest to fully assess the proposed relief.
2. Furthermore, the Office of the United States Trustee is in the process of forming a committee of retired employees and has scheduled a formation meeting for Tuesday, August 20, 2013.

3. Any committee formed for the purpose of participation in this case should be provided with an opportunity to review and respond to all requests of the Debtor, including the current Motion.

4. Finally, the RDPMA concurs in the objection to the Motion filed by Erste Europäische Pfandbrief – und Kommunalkreditbank Aktiengesellschaft (“EEPK”) filed at Docket No. 246, and hereby incorporates EEPK’s objection herein.

WHEREFORE, the RDPMA would request that this Honorable Court adjourn any hearing on the Motion until a time at which any committee to be appointed by the Office of the US Trustee would have reasonable time to review and respond to the Motion.

Respectfully Submitted,

STROBL & SHARP, P.C.

/s/ Meredith E. Taunt
LYNN M. BRIMER (P43291)
MEREDITH E. TAUNT (P69698)
MALLORY FIELD (75289)
Attorneys for the Retired Detroit
Police Members Association
300 East Long Lake Road, Suite 200
Bloomfield Hills, MI 48304-2376
Telephone: (248) 540-2300
Facsimile: (248) 645-2690
E-mail: mtaunt@stroblpc.com

Dated: August 16, 2013

*S&B\85244\001\PLDG\SB424893.DOCX